

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD OF PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et  
al.*<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS  
(Jointly Administered)

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Debtors.

**INFORMATIVE MOTION OF THE QTCB NOTEHOLDER  
GROUP REGARDING PRETRIAL CONFERENCE AND CONFIRMATION HEARING**

The QTCB Noteholder Group<sup>2</sup> hereby submits this informative motion pursuant to the Court's *Order Regarding Procedures for Hearing on Confirmation of Plan of Adjustment* (the "Order") (Dkt. No. 18502, Case No. 17-BK-3283), and respectfully states as follows:

1. Kurt A. Mayr and David L. Lawton of Morgan, Lewis & Bockius LLP will appear on behalf of the QTCB Noteholder Group at the Pretrial Conference<sup>3</sup> and the

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> The QTCB Noteholder Group has the same meaning as set forth in *Notice of Appearance and Request for Notice* (Dkt. No. 134, Case No. 17-3283 LTS) and *Tenth Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* (Dkt. No. 17296, Case No. 17-3283).

<sup>3</sup> All capitalized terms used but not defined herein shall have the meanings ascribed to them in the Order.

Confirmation Hearing via Zoom. The Party Appearance Sheet, Witness Cover Sheet, and Exhibit Cover Sheet are attached hereto as **Exhibit A**, **Exhibit B**, and **Exhibit C**, respectively.

2. The QTCB Noteholder Group reserves its right to be heard on any matter presented to the Court, including, but not limited to, the *Reservation of Rights of PSA Creditors regarding Ballots Cast with respect to Seventh Amended Plan of Adjustment* (Dkt. No. 18453, Case No. 17-BK-3283), and to respond to any statements made by any party related to the above-captioned Title III cases, and/or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of the QTCB Noteholder Group.

**WHEREFORE**, the QTCB Noteholder Group respectfully requests that the Court take notice of the foregoing.

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**RESPECTFULLY SUBMITTED,**

Dated: October 26, 2021  
San Juan, Puerto Rico

**Morgan, Lewis & Bockius LLP**

/s/ Kurt A. Mayr  
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*Co-Counsel for the QTCB Noteholder Group*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on October 26, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send automatic notifications of such filing to all attorneys of record.

**CORREA ACEVEDO & ABESADA  
LAW OFFICES, P.S.C.**

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**EXHIBIT A**

**Party Appearance Sheet**

Name of Party	The QTCB Noteholder Group
Party Name Abbreviation (For Use with Zoom)	QTCB
Pretrial Conference and Confirmation Hearing Participant  Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party): <ul style="list-style-type: none"><li>• Name,</li><li>• Email,</li><li>• Law Firm,</li><li>• Phone Number, and</li><li>• Docket No. for the Attorney's Notice of Appearance</li><li>• Zoom Screen Name</li><li>• Is the attorney participating in the Pretrial Conference or the Confirmation Hearing or Both?</li></ul>	Kurt A. Mayr kurt.mayr@morganlewis.com Morgan, Lewis & Bockius LLP (860) 240-2700 <i>Pro Hac Vice</i> Docket No. 165 <sup>1</sup> Zoom Screen Name: QTCB / Mayr, Kurt / Morgan, Lewis & Bockius LLP Participating in the Pretrial Conference and the Confirmation Hearing  David L. Lawton david.lawton@morganlewis.com Morgan, Lewis & Bockius LLP (860) 240-2700 <i>Pro Hac Vice</i> Docket No. 165 <sup>2</sup> Zoom Screen Name: QTCB / Lawton, David / Morgan, Lewis & Bockius LLP Participating in the Pretrial Conference and the Confirmation Hearing
Plan Objection Docket No.	N/A
Witness List Docket No.	N/A
Exhibit List Docket No.	N/A
Other Statement Docket No.	18453

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<sup>1</sup> See also Notice of Change of Contact Information [Dkt. No. 8585].

<sup>2</sup> See also Notice of Change of Contact Information [Dkt. No. 8585].

**EXHIBIT B**

Parity Witness Cover Sheet

Name of Party	The QTCB Noteholder Group
Does the Party intend to offer a witness?	No, the QTCB Noteholder Group reserves its right be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, and/or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of the QTCB Noteholder Group.

**EXHIBIT C**

Party Exhibit Cover Sheet

Name of Party	The QTCB Noteholder Group
Does the Party intend to offer evidence?	No, the QTCB Noteholder Group reserves its right be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, and/or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of the QTCB Noteholder Group.